Title Index

[The] Accumulated Earnings Tax and the Deduction for Dividends in Property: Market Value or Basis? *Lawrence M. Axelrod* 208

Article Digests, *Pamela J. Stephens* 88, 177, 290

Changes in the Taxation of Corporations Effected by the Tax Reform Act of 1976, Parts I and II, *Daniel Q. Posin* 185, 299

Close Corporations: *Theodore Ness*
- Estate Tax Effect of Life Insurance Proceeds Payable to Corporation 59
- Meaningful Reduction Test in Stock Redemption 61

Compensation and Fringe Benefits: *Marcus D. Grayck*
- [The] *Daniel* Case: Implications of SEC Regulation of Retirement Plan Disclosure 358
- Nondiscriminatory Vesting Standards Under ERISA 71
- Vesting Standards Under ERISA—Accrued Benefits 263

Complexity in the Tax Laws and Tax Reform: A Modern Fable, *Peter L. Faber* 42

Consolidated Returns: *Richard M. Horwood*
- Limitations on Net Operating Loss Carryovers Where Change of Ownership 150

Corporate Reorganizations: *John F. Bogaard*
- *Aetna* Result: Is Exchange of Stock of Corporation Not a Party to an "F" Reorganization a Sale or a Reorganization? 251
- Liquidation-Reincorporation: Its Treatment Under Revenue Ruling 76-479 64

Corporation Slush Funds: Deductibility of "Sensitive" Payments, *Stephen J. Alfred* 130

Fairfax Revisited, *James E. Smith* 347

Funding Estate Tax Installment Payments With Section 303 Redemptions After the 1976 Tax Reform Act, *J. Clifton Fleming, Jr.* 22

Income From Cancellation of Indebtedness: Historical Footnote to *Kirby Lumber Co., Boris I. Bittker* 124

Intercorporate Dividends and Legitimate Tax Avoidance, *James H. Ditkoff* 5

International Developments, *William C. Gifford*
- Allocation of Deductions 77
- Allocation of Income 366
- "Controlled" Foreign Corporations 371
- "Corporate" Regulations 157
- Final Section 861 Regulations 158

Foreign Tax Credit 370
International Boycotts 74
Legislative Activity After Tax Reduction and Rulings Procedures Under Section 367 369
Simplification Act of 1977 268
Tax Reduction and Simplification Act of 1977 and Other Legislation 156
Tax Treaties 269

International Developments—Another View: *Philip T. Kaplan*
Direct Investment in the United States 271

Losses from Wash Sales of Stock or Securities, *Jonathan Krane* 226

Recent Cases and Rulings, *William T. Hutton*
"C" Reorganizations: When You Have Lunch With a Conglomerate, Who Pays the Check? 169
Chip Shots From the Service 171
Crane Case—Footnote 37 (Thirty Years Old, and Weakening) 174
Disproportionate Contributions Qualify for Nonrecognition 82
Dividends Paid in Appreciated Property 79
Escrowed Stock and the "C" Reorganization 80
Fehrs Again—In Pursuit of Truth and Justice 376
Imputed Interest and Contingent Stock 286
On Reading Advance Sheets 380
Ordinary and Necessary Business Expenses—Accrual of Benefits Test 87
Redemptions as Business Expenses: *Gilmore* Comes to Splitsville 166
Redemptions by Subsidiaries of Parents' Stock 84
[The] Subchapter S Satellite 83
Section 333—Will Transitory Holding by Corporation of Partnership Interest Qualify? 379
Tax Benefit Rule Applies to Section 336 Liquidations 288

Scope of Section 1248—Dispositions of Stock in Controlled Foreign Corporation—As Expanded by Tax Reform Act of 1976, *Susan F. Klein* 336

Stock Redemptions and the Accumulated Earnings Tax—An Update, *E. George Rudolph* 101

Tax Accounting: *Eugene I. Krieger*
Brother-Sister Controlled Group—*Fairfax Auto* Overturned 164
Brother-Sister Controlled Group—Issue Still Unsettled 375
Earnings and Profits and Redemptive Distributions 372
Exchange of Property for Promise to Deliver Like-Kind Property—Round 2 373
Going Concern Value 160
LIFO Conformity Requirements 282

Liabilities in Section 334(b)(2) Liquidations 162
Section 482 Converts Dividend Into Sale 281
Timing of Distributions in Section 337 Liquidations 283
Washington Tax Watch: *H. Lawrence Fox & James K. Jackson*
IRS Reevaluates Deductibility of Construction-Related Overhead Expenses 354
[The] National Energy Plan 244
Section 861(b) Regulations—Allocation and Apportionment of Deductions Within U.S. and From Other Sources 47
Senator Bob Packwood 56
Tax Reduction and Simplification Act of 1977 177

Author Index

ALFRED, STEPHEN J., *Corporation Slush Funds: Deductibility of "Sensitive" Payments* 130
AXELROD, LAWRENCE M., *Accumulated Earnings Tax and Deduction for Dividends in Property: Market Value or Basis?* 208
BITTKER, BORIS I., *Income From Cancellation of Indebtedness: Historical Footnote to* Kirby Lumber Co. 124
BOGAARD, JOHN F., *Corporate Reorganizations:*
Aetna *Result: Is Exchange of Stock of Corporation Not a Party to an "F" Reorganization a Sale or Reorganization?* 251
Liquidation-Reincorporation: Its Treatment Under Revenue Ruling 76-429 64
DITKOFF, JAMES H., *Intercorporate Dividends and Legitimate Tax Avoidance* 5
FABER, PETER L., *Complexity in the Tax Laws and Tax Reform: A Modern Fable* 42
FLEMING, JR., J. CLIFTON, *Funding Estate Tax Installment Payments With Section 303 Redemptions After 1976 Tax Reform Act* 22
FOX, H. LAWRENCE, & JACKSON, JAMES K., *Washington Tax Watch:*
IRS Reevaluates Deductibility of Construction-Related Overhead Expenses 354
[The] National Energy Plan 244
Section 861(b) Regulations—Allocation and Apportionment of Deductions Within U.S. and From Other Sources 47
Senator Bob Packwood 56
Tax Reduction and Simplification Act of 1977 177
GIFFORD, WILLIAM C., *International Developments: Allocation of Deductions* 77

Allocation of Income 366
"Controlled" Foreign Corporations 371
"Corporate" Regulations 157
Final Section 861 Regulations 158
Foreign Tax Credit 370
International Boycotts 74
Legislative Activity After Tax Reduction and Simplification Act of 1977 268
Ruling Procedures Under Section 367 369
Tax Reduction and Simplification Act of 1977 and Other Legislation 156
Tax Treaties 269

GRAYCK, MARCUS D., *Compensation and Fringe Benefits: [The]* Daniel *Case: Implications of SEC Regulation of Retirement Plan Disclosure* 358
Nondiscriminatory Vesting Standards Under ERISA 71
Vesting Standards Under ERISA—Accrued Benefits 263

HORWOOD, RICHARD M., *Consolidated Returns: Limitations on Net Operating Loss Carryovers Where Change of Ownership* 150

HUTTON, WILLIAM T., *Recent Cases and Rulings: "C" Reorganizations: When You Have Lunch With a Conglomerate, Who Pays the Check?* 169
Chip Shots From the Service 171
Crane *Case—Footnote 37 (Thirty Years Old, and Weakening)* 174
Disproportionate Contributions Qualify for Nonrecognition 82
Dividends Paid in Appreciated Property 79
Escrowed Stock and the "C" Reorganization 80
Fehrs *Again—In Pursuit of Truth and Justice* 376
Imputed Interest and Contingent Stock 286
On Reading Advance Sheets 380
Ordinary and Necessary Business Expenses—Accrual of Benefits Test 87
Redemptions as Business Expenses: Gilmore *Comes to Splitsville* 166
Redemptions by Subsidiaries of Parents' Stock 84
Section 333—Will Transitory Holding by Corporation of Partnership Interest Qualify? 379
[The] Subchapter S Satellite 83
Tax Benefit Rule Applies to Section 336 Liquidations 288

KAPLAN, PHILIP T., *International Developments—Another View: Direct Investment in the United States* 271

KLEIN, SUSAN F., *Scope of Section 1248—Dispositions of Stock in Controlled Foreign Corporation—As Expanded by Tax Reform Act of 1976* 336

KRANE, JONATHAN, *Losses From Wash Sales or Securities* 226
KRIEGER, EUGENE I., *Tax Accounting:*
Brother-Sister Controlled Group—Fairfax Auto *Overturned* 164
Brother-Sister Controlled Group—Issue Still Unsettled 375
Earnings and Profits and Redemptive Distributions 372
Exchange of Property for Promise to Deliver Like-Kind Property—Round 2 373
Going Concern Value 160
LIFO Conformity Requirements 282
Liabilities in Section 334(b)(2) Liquidations 162
Section 482 Converts Dividend Into Sale 281
Timing of Distributions in Section 337 Liquidation 283
NESS, THEODORE, *Close Corporations:*
Estate Tax Effect of Life Insurance Proceeds Payable to Corporation 59
Meaningful Reduction Test in Stock Redemption 61
POSIN, DANIEL Q., *Changes in the Taxation of Corporations Affected by the Tax Reform Act of 1976* 185, 299
RUDOLPH, E. GEORGE, *Stock Redemptions and Accumulated Earnings Tax—An Update* 101
SMITH, JAMES E., Fairfax *Revisited* 347
STEPHENS, PAMELA J., *Article Digests* 88, 177, 290

Index to Book Reviews

Federal Income Taxation of Corporations Filing Consolidated Returns, *Herbert J. Lerner, Richard S. Antes, Robert M. Rosen, and Bernard A. Finkelstein,* reviewed by *John Broadbent* 94

"We live in a complex society–so the tax laws cannot be simple for everyone."

—Sheldon S. Cohen
Former Commissioner of Internal Revenue